

DENNIS J. HERRERA, State Bar #139669
City Attorney
CHERYL ADAMS, State Bar #164194
Chief Trial Deputy
PETER J. KEITH, State Bar #206482
LEILA K. MONGAN, State Bar #271287
Deputy City Attorney
Fox Plaza
1390 Market Street, Sixth Floor
San Francisco, California 94102-5408
Telephone: (415) 554-3908 [Keith]
Telephone: (415) 554-3915 [Mongan]
Facsimile: (415) 554-3837
E-Mail: peter.keith@sfgov.org
E-Mail: leila.mongan@sfgov.org

Attorneys for Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JAMESON ASHLEY,

Plaintiff,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, MICHAEL HENNESSEY,
individually and in his official capacity as
Sheriff of the San Francisco County Sheriff's
Department; and DOES 1 to 30,

Defendants.

Case No. CV-12-0045

**JOINT STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINES FOR
MEDIATION AND FOR AMENDMENTS TO
THE COMPLAINT**

Date Action Filed: January 26, 2012
Trial Date: April 29, 2013

Pursuant to Local Rule 6-1(a), and with the agreement of the Court's ADR Unit, Plaintiff Jameson Ashley and Defendant City and County of San Francisco, by and through their attorneys of record, hereby stipulate and agree that (1) the time to complete court mediation in this matter shall be extended until and through October 30, 2012; and (2) the time for plaintiff to file an amended complaint shall be extended until and through October 30, 2012.

1 IT IS SO STIPULATED.

2 Dated: August 29, 2012

3 DENNIS J. HERRERA
4 City Attorney
5 JOANNE HOEPER
6 Chief Trial Deputy

7 Deputy City Attorney

8 By: /s/_____
9 LEILA K. MONGAN

10 Attorneys for Defendant
11 CITY AND COUNTY OF SAN FRANCISCO

12 Dated: August 29, 2012

13 SIMS, CURRAN & OCKEN

14 By: /s/_____
15 STUART R. CURRAN

16 Attorneys for Plaintiff
17 JAMESON ASHLEY

18 **DECLARATION OF LEILA K. MONGAN**

19 I, Leila K. Mongan, declare as follows:

20 1. I am a deputy city attorney in the San Francisco City Attorney's Office. I am the
21 deputy primarily assigned to handle this case on behalf of the City and County of San Francisco. By
22 virtue of my direct involvement in the matter, I have personal knowledge of the contents of this
23 declaration, and I could and would competently testify to the truth of the matters stated.

24 2. The parties have stipulated to extend the time in which to complete court mediation so
25 that they may take additional discovery prior to mediation. Due to scheduling difficulties and
26 discovery disputes, the parties have not been able to complete all depositions prior to the August 31,
27 2012 deadline for court mediation.
28

3. The parties have stipulated to extend the time in which plaintiff may amend his complaint so that plaintiff may take additional discovery. Due to scheduling difficulties and discovery disputes, the parties have not been able to complete all depositions prior to the August 31, 2012 deadline for plaintiff to amend his complaint.

4. There have been three previous stipulated time modifications in this case. The parties stipulated to extend the deadline for defendants to respond to plaintiff's complaint; the parties stipulated to extend the deadline in which to complete mediation; and the parties stipulated to extend the time for plaintiff to amend his complaint.

5. This requested time modification may affect the deadlines for fact and expert discovery, which are ~~presently~~ set for September 28, 2012 and November 23, 2012, respectively. The parties will confer and file a motion to modify the Court's Order Scheduling Trial and Pretrial Matters to amend those dates as necessary.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, and that I signed this declaration on August 29, 2012, at San Francisco, California.

Leila K. Mongan

LEILA K. MONGAN

ORDER

Based on the above stipulation, and for good cause appearing, IT IS ORDERED as follows:

The deadline for the parties to complete court mediation in this case is hereby extended until and including October 30, 2012.

The deadline for plaintiff to file an amended complaint is hereby extended until and including October 30, 2012.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: August 31, 2012


THE HONORABLE JEFFREY S. WHITE
UNITED STATES DISTRICT JUDGE